

Message

From: Olinger, Christine [Olinger.Christine@epa.gov]
Sent: 6/1/2021 4:03:24 PM
To: Swartz, Christina [Swartz.Christina@epa.gov]
Subject: SFIREG Questions

Good afternoon all,

I've received questions for this session from SFIREG. Apologies for not being able to send these sooner – seems there was a SFIREG internal snafu in sending these to EPA. Given that the neonic treated seeds session will be on June 8th, I don't know that there will be time enough to prepare responses for all questions. I'm also not certain if we've got the complete group of people from OPP (outside of OPP?) needed to process these questions. Please let me know it would be helpful to include others and also to schedule a meeting to discuss these questions and the upcoming session.

SFIREG Questions for EPA:

- These neonicotinoid treated seeds are exempt from FIFRA regulations per 40 CFR 152.25(a) Treated Articles or Substances; what will it take to see the treated article determination changed?
- When does EPA anticipate finalizing the answers to the coated seed petition?
- How is this situation similar/different from regulating persistence as we have seen in grass clippings, mulch, manure, etc...?
- Are we again looking to regulate beyond the user?
- With changes/improvements in seed coating technology is there an increase in residual presence?
- If so, is this being considered by EPA?
- Were/are the seed treatment associations in contact with EPA?
- Regardless of whether they are considered treated articles under FIFRA, are treated seeds regulated under the Federal Seed Act?
- Does the EPA's risk assessments for pesticides used to treat seeds evaluate the potential risks from exposures to the pesticides from the plant or vegetation that grows from the seeds. If not, would EPA consider an evaluation of these potential risks, as they do for runoff, dusting, and consumption of unsown seed?

If possible, having EPA provide a review of the process for the neonicotinoids approved for treating seeds from OPP-EFED as it relates to environmental exposure and pollinators would be beneficial.

Thanks,

Sandra O'Neill
919 323 7926